

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Petition for Rulemaking to Allow the	)	RM-11836
MA3 All-Digital Mode of HD Radio	)	
for AM Stations	)	MB Docket No. 13249
	)	
Revitalization of the AM Radio Service	)	
	)	

**COMMENTS OF BRISTOL COUNTY BROADCASTING, INC./SNE  
BROADCASTING, LTD.**

Bristol County Broadcasting, Inc. and SNE Broadcasting, Ltd (the “Licensees”) hereby submit comments in support of the above-captioned Petition for Rulemaking (the “Petition”) filed by Bryan Broadcasting Corporation (“BBC”) urging the Commission to initiate a rulemaking proceeding to authorize the voluntary transition to the MA3 all-digital mode of HD radio for AM broadcast radio stations. Bristol County Broadcasting, Inc. is the licensee of AM station WSAR in Fall River, MA, and SNE Broadcasting, Ltd. is the licensee of AM station WHTB in Fall River, MA.

The Licensees fully support the BBC Petition to allow AM radio stations to broadcast all-digital using the HD Radio MA3 mode. The Licensees have owned WSAR and WHTB since the mid-1980s. Any technology that has the potential to better serve AM listeners with quality audio is something that should be explored by the FCC. Given that there is now a significant percentage of car radios that can receive HD Radio in the MA3 mode, the FCC owes it to the public to quickly move forward with a proceeding looking toward authorizing this mode of

broadcasting. FCC allowing for AM all-digital operations will offer a future option for all AM stations.

Respectfully submitted,

**Bristol County Broadcasting, Inc./SNE  
Broadcasting, Ltd.**



By: \_\_\_\_\_  
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May 13, 2019

## **CERTIFICATE OF SERVICE**

I, Rebecca Jacobs Goldman, hereby declare that a copy of the foregoing comments were sent via email, this day, May 13, 2019 to the following, as required by section 1.405 of the Commission's rules:

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